

1 LOCKE LORD BISSELL & LIDDELL LLP
MICHAEL V. POWELL (TX SBN 16204400) (appearance *pro hac vice*)
2 mpowell@lockelord.com
2200 Ross Avenue, Suite 2200
3 Dallas, Texas 75201-6776
Telephone: (214) 740-8520
4 Facsimile: (214) 756-8520

5 COOPER, WHITE & COOPER LLP
STEPHEN KAUS (SBN 57454)
6 skaus@cwclaw.com
JIE-MING CHOU (SBN 211346)
7 jchou@cwclaw.com
201 California Street, 17th Floor
8 San Francisco, California 94111
Telephone: (415) 433-1900
9 Facsimile: (415) 433-5530

10 Attorneys for Defendant, American Airlines, Inc.

11
12 **UNITED STATES DISTRICT COURT**

13 **NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**
14

15 KATHLEEN HANNI, individually and on
behalf of all others similarly situated,

16 Plaintiff,

17 vs.
18

AMERICAN AIRLINES, INC., and DOES 1
19 through 20, inclusive,

20 Defendants.
21

CASE NO. C08-00732 CW

**NOTICE OF MOTION AND MOTION
FOR LEAVE TO FILE AMENDED
NOTICE OF REMOVAL BY
DEFENDANT AMERICAN AIRLINES,
INC.**

28 U.S.C. §§ 1441(a), 1446, and 1453(b)

Date: April 24, 2008
Time: 2:00 p.m.
Courtroom: 2, 4th Floor

22
23 PLEASE TAKE NOTICE that on April 24, 2008 in the courtroom of the Honorable
24 Claudia Wilken at the United States Courthouse located at 1301 Clay Street, Oakland, California,
25 defendant American Airlines, Inc. ("American"), will and hereby does move pursuant to 28 U.S.C.
26 §§ 1441(a), 1446, and 1453(b) for leave to file an Amended Notice of Removal.
27

28 American makes this motion on the grounds that:

1 (1) the March 3, 2008 settlement demand letter sent by Mr. Paul S. Hudson, counsel
2 for plaintiff Hanni, to American (the "Settlement Demand") offers additional facts supporting
3 allegations of jurisdiction made in American's original Notice of Removal and further establishes
4 that the amount in controversy in this putative class action exceeds the sum or value of
5 \$5,000,000, exclusive of interest and costs;

6
7 (2) the Settlement Demand is an "other paper" from the plaintiff from which the
8 amount in controversy may be ascertained; and

9 (3) the Amended Notice of Removal is timely filed since it is within 30 days after
10 American first received the Settlement Demand.

11 This motion is based on this Notice of Motion and Motion, the Memorandum of Points and
12 Authorities, (Proposed) Order, and the Declarations of Michael Powell and Jie-Ming Chou filed
13 herewith, and upon other such matters as may be presented to this Court.
14

15 DATED: March 19, 2008

COOPER, WHITE & COOPER LLP

16
17 By: 

Jie-Ming Chou

Attorneys for Defendant American Airlines, Inc.
18
19
20
21
22
23
24
25
26
27
28